

Curling, Donna v. Raffensperger, Brad

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 DONNA CURLING, et al.,

5 Plaintiffs, CIVIL ACTION FILE

6 vs. NO. 1:17-cv-2989-AT

7 BRAD RAFFENSPERGER, et

8 al.,

9 Defendants.

10  
11  
12 DEPOSITION OF

13 MEGAN MISSETT

14 September 28, 2021

15 1:07 p.m.

16  
17 TAKEN BY REMOTE VIDEO CONFERENCE

18 LaRita J. Cormier, RPR, CCR-2578  
19  
20  
21  
22  
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24  
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15 MATT RIESDORPH, Veritext Concierge

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## P R O C E E D I N G S

THE REPORTER: Due to the need for this deposition to take place remotely because of the government's order for social distancing, the parties will stipulate that the court reporter may swear in the witness over the Veritext Virtual Videoconference and that the witness has verified that she is in fact Megan Missett.

MEGAN MISSETT,  
having been first duly sworn, was examined and testified as follows:

## EXAMINATION

BY MS. LaROSS:

Q. Ms. Missett, I'm going to be asking you some questions. I just want to make sure I'm pronouncing your name correctly. Is Missett the correct pronunciation?

A. Missett is perfect, but you might see that I'm registered to vote as Margaret Missett. That's the name on my birth certificate and the name I fly and vote under, but everyone else calls me Megan.

Q. All right, great. I was going to clarify that with you, and I appreciate that you did so.

So good afternoon, Ms. Missett.

MS. LaROSS: This will be the deposition of

1 Mississippi. I think that's it.

2 Q. And are you from New Jersey?

3 A. Originally.

4 Q. Originally?

5 A. (The witness nods.)

6 Q. So are you from New Jersey originally?

7 A. Yes. I was born there and lived there  
8 until I was a teenager.

9 Q. And then how long did you live in New York?

10 A. About ten years, to the best of my  
11 recollection.

12 Q. So would that have been sometime when you  
13 were a teenager, and then for ten years after that?  
14 Is that correct?

15 A. Yeah.

16 Q. And then from New York, did you move to  
17 Mississippi?

18 A. Yes.

19 Q. How long did you live in Mississippi?

20 A. Two years, approximately.

21 Q. And then from Mississippi, did you move to  
22 Georgia?

23 A. Yes.

24 Q. And what year did you move to Georgia?

25 A. 1996.

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1 Q. So during the Olympics, I guess?

2 A. Right after the Olympics, yes.

3 Q. And since you moved to Georgia in 1996,  
4 have you always resided in Fulton County?

5 A. Yes.

6 Q. Do you have any relatives that live in the  
7 Atlanta area?

8 A. No, other than my immediate family, my  
9 husband and children.

10 Q. And is your husband's last name Missett as  
11 well?

12 A. No. It's Greenwald.

13 Q. And what are the last names of your  
14 children?

15 A. Greenwald.

16 Q. Any other relatives north of Atlanta?

17 A. No.

18 Q. Have you ever given a deposition before?

19 A. No.

20 Q. Have you ever testified in court before?

21 A. No.

22 Q. Have you ever testified in the Georgia  
23 legislature?

24 A. Yes.

25 Q. And when did you testify in the Georgia

1 legislature?

2 A. I don't recall the date.

3 Q. What was -- well, let me ask this: How  
4 many times have you testified in the Georgia  
5 legislature?

6 A. I don't actually know the number, but it  
7 was always in regard to something to do with voting,  
8 voting legislation.

9 Q. So it was -- you testified more than once  
10 you can say?

11 A. I believe so.

12 Q. Okay. And was it, you know, more than ten  
13 times, or was it --

14 A. No. Less than ten times. Can you tell me  
15 what is defined as testifying before the  
16 legislature?

17 Q. Sure.

18 A. We've had smaller meetings, but you know.

19 Q. Okay, sure. So it would be -- well, let me  
20 ask it this way. So what about at a hearing that's  
21 held in the Georgia legislature?

22 A. Uh-huh.

23 Q. So is that the circumstance that you have  
24 been referring to for your testimony before the  
25 Georgia legislature?



1 A. Yes, I've done that.

2 Q. Okay. And then was there any other kind of  
3 testimony that you gave in the legislature?

4 A. I'm trying to recall whether I testified at  
5 any of the citizen participation opportunities; but  
6 again, I'm not sure if that would qualify, which is  
7 a state committee.

8 Q. Okay. So what -- what committees have you  
9 testified at hearings?

10 A. Ooh, that's a good question. Any of the  
11 committees that were involved in voting legislation.

12 Q. And when did you testify?

13 A. I don't recall.

14 Q. Would it have -- and what were the issues  
15 that you testified about?

16 A. Electronic voting systems; wanting, you  
17 know, hand-marked paper ballots; issues with, you  
18 know, fair voting, voter suppression.

19 Q. So would you say that the occasions that  
20 you testified in front of a Georgia legislative  
21 committee has been within the last ten years?

22 A. Yes.

23 Q. And your testimony, did it concern DREs or  
24 voting machines, direct recording devices?

25 A. Yeah, DREs.

1 interested in voting or other -- other things or  
2 lobbying their legislators.

3 Q. Did you speak with any particular  
4 legislators?

5 A. Not at the capitol.

6 Q. And have you spoken with legislators  
7 anywhere other than the capitol?

8 A. Informally, and sometimes by e-mail or --  
9 yeah.

10 Q. And what topics did you speak informally to  
11 the legislators?

12 A. Usually things that concern me about  
13 voting.

14 Q. And what are those concerns that you  
15 addressed with legislators?

16 A. What are my concerns about voting?

17 Q. Yeah, that you addressed with the  
18 legislators that you've just referred to.

19 A. I have concerns about the trustworthiness  
20 of the electronic voting system in Georgia, and I  
21 also have issues with -- with some systematic bias  
22 and access to the ballot.

23 Q. So describe what your issues and concerns  
24 are pertaining to trustworthiness.

25 A. Oh. You mean with electronic voting

1 A. Okay.

2 Q. And so after high school, describe for me  
3 your education.

4 A. Sure. I left high school my senior year  
5 and got a GED while attending Monmouth College,  
6 which is in New Jersey, now called Monmouth  
7 University. Then I transferred to Sarah Lawrence  
8 College, graduated in 1986. That sound right? Yes,  
9 1986. And spent a year working, and then went to  
10 graduate school in clinical psych at St. John's  
11 University in New York, and I got my Ph.D. in 1992  
12 is when it was completed.

13 Q. Okay. So your study with the -- in New  
14 Jersey, did you receive a degree from that  
15 university as a result of your study there?

16 A. Monmouth University?

17 Q. Yes.

18 A. No, because I transferred to Sarah Lawrence  
19 and I got my degree from Sarah Lawrence.

20 Q. And your study at Monmouth, what topic  
21 areas or major did you have?

22 A. It was psychology. When I got to Sarah  
23 Lawrence, it was psychology with a minor in  
24 genetics.

25 Q. And what degree did you receive from the

1 A. No.

2 Q. I'm going to ask you a few more questions  
3 concerning your education. Have you had any formal  
4 education concerning voting or elections?

5 A. No.

6 Q. Sorry, say that again?

7 A. No, I haven't had formal education in  
8 voting or elections.

9 Q. Any formal education or training in Georgia  
10 election law?

11 A. No, I haven't had formal training.

12 Q. Any formal education or training in Georgia  
13 election administration or administration procedures  
14 in Georgia?

15 A. No formal training.

16 Q. Have you ever worked at a polling place?

17 A. Yes, I have worked at a polling place.

18 Q. And what jobs have you done at polling  
19 places?

20 A. Observation, which is one of the things I  
21 didn't refresh my memory dates about, so I would  
22 have to go back to see, you know, where and when it  
23 was.

24 Q. How many occasions did you work in a  
25 polling place?

1 A. At least three, but I can't be precise.

2 Q. And was that at the same precinct, or what  
3 precinct did you work at?

4 A. Once was in DeKalb, twice it was in DeKalb.  
5 I'd really have to go back and refresh myself. I  
6 don't remember the most recent place where it was.

7 Q. Okay. So it may or may not have been  
8 DeKalb?

9 A. No, I definitely did some poll watching in  
10 DeKalb and Pleasantdale.

11 Q. And the work that you recall doing in  
12 DeKalb, what was your function at the polling place?

13 A. The first time, I was doing it on behalf of  
14 the Ossoff campaign, so I was helping voters who  
15 were confused and, you know, making sure everything  
16 was okay.

17 Q. When you say helping voters who were  
18 confused, what do you mean by that?

19 A. If anyone had a problem or looked upset or  
20 left the polling place because they were turned  
21 away, we could provide any help.

22 Q. What kind of help did you provide?

23 A. That didn't -- that didn't happen in  
24 Pleasantdale. It was very smooth.

25 Q. And the other occasions that you worked at

1 was that --

2 A. I don't recall.

3 Q. -- do you recall?

4 A. (The witness shakes head.)

5 Q. So would it have been in Fulton County, do  
6 you think?

7 A. I'm not sure.

8 Q. And what had you being there? You said the  
9 first time you went and it was part of the Ossoff  
10 campaign?

11 A. Correct.

12 Q. So what occasioned you to be at the polling  
13 place that you just described?

14 A. It was probably through one of CGG's, you  
15 know, citizen engagement efforts.

16 Q. And CGG, what does that stand for?

17 A. Coalition for Good Governance.

18 Q. And on that occasion, did you observe  
19 anyone who had a problem using the ballot marking  
20 device?

21 A. I don't believe so, to the best of my  
22 recollection. I came in towards the end of voting,  
23 and there's more those little -- you know, the  
24 workers were just unfamiliar, understandably, with  
25 the new equipment.

1 things that the Coalition for Good Governance was  
2 involved in as well.

3 Q. What was the purpose of taking photographs  
4 of the poll tapes?

5 A. Well, with the DREs, you get a printout  
6 from each machine so you can see, you have  
7 photographic evidence of what happened with that  
8 machine. So sometimes when you see anomalous, you  
9 know, results when the results come in, you can go  
10 and see what happened at the precinct, was there  
11 something funny with one of the machines, was there,  
12 you know, statistically crazy things. And a lot of  
13 people like to take these so that they can get their  
14 own count on election nights. That's one thing you  
15 can do. But the other thing is you can analyze the  
16 tapes to see some of the machine behavior. It's  
17 different with the BMDs.

18 Q. So the photographing the poll tapes, was  
19 that when we were using DREs?

20 A. Yes; it continued through using BMDs. And  
21 at this point, there are many other organizations  
22 involved as well.

23 Q. What other organizations?

24 A. So, so many. It's pretty -- even county  
25 committees and, you know, at this point people have

1 Q. Would it have been closer to a couple, or  
2 would it be closer to ten?

3 A. I would say closer to five.

4 Q. So approximately five occasions of  
5 photographing poll taping; is that correct?

6 A. Yeah, at least.

7 Q. Sorry, did you just say at least?

8 A. Yes. I don't recall how many times  
9 exactly, but...

10 Q. And where did you do the photographing of  
11 poll taping?

12 A. Me personally, usually in Fulton County,  
13 DeKalb, and then later in Southwest Georgia.

14 Q. And where in Southwest Georgia?

15 A. Dougherty County, Randolph County, Terrell  
16 County, places where it was difficult to get people  
17 to do it.

18 Q. And which elections did you photograph poll  
19 taping?

20 A. I don't recall exactly which elections,  
21 but, you know, general primary, I -- I did it for  
22 the last -- the runoff and the general.

23 Q. When you say last runoff, that would have  
24 been earlier this year in 2021; correct?

25 A. Right.



1 Q. And for the runoff, was that when you went  
2 down to the various counties in South Georgia? Is  
3 that --

4 A. Yes. Also for the general.

5 Q. And on those occasions, were you there on  
6 behalf of the Coalition?

7 A. The first few times we did that, the  
8 Coalition was really the only organization that was  
9 advocating for that in Georgia, to the best of my  
10 knowledge. But as time went on, it became a much  
11 bigger affair. So the last time it was certainly --  
12 it was providing data to the Coalition and to anyone  
13 else who wanted the ideas and to share information  
14 in an open way.

15 Q. Just a couple questions about your  
16 education. Any training or education related to  
17 computer hardware or programming?

18 A. Because of the time that I, you know, went  
19 to school and got a Ph.D., I had to do FORTRAN and  
20 Pascal and that stuff.

21 Q. How about any training or education related  
22 to computer hardware that's involved in voting?

23 A. No.

24 Q. Any training or formal education in  
25 cybersecurity?

1 A. No.

2 Q. Any training or formal education concerning  
3 voting equipment?

4 A. No.

5 Q. Any training or education related to  
6 computer hacking or insertion of malware in a  
7 computer system or voting machine?

8 A. No.

9 Q. Any training or education concerning the  
10 operation of a DRE?

11 A. No.

12 Q. Any training or education concerning the  
13 operation and functioning of BMDs?

14 A. No, not other than what is available to the  
15 general public, no formal classes.

16 Q. Any training or education concerning the  
17 operation or functioning of scanners used in  
18 conjunction with ballot marking devices?

19 A. No.

20 MR. ICHTER: I missed that class too.

21 BY MS. LaROSS:

22 Q. Now have you ever voted on a DRE?

23 A. Yes.

24 Q. And have you ever voted on a BMD?

25 A. Yes.

1 Q. And how many occasions have you voted on a  
2 BMD?

3 A. March 2020, June 2020. To the best of my  
4 recollection, those are the two times.

5 Q. And where did you vote on a BMD in March of  
6 2020?

7 A. That was at Scotts Crossing library, an  
8 early voting location.

9 Q. Did you have any trouble or difficulty  
10 voting on a BMD on that occasion?

11 A. I didn't have trouble operating the BMD  
12 There were some issues with privacy, but operation  
13 was fine.

14 Q. And the issues with privacy, what were  
15 those issues?

16 A. The way the touchscreens are set up next to  
17 each other in a line you have to go in the back and  
18 pass everybody's screen to get to an empty voting  
19 machine; and this was one of the earlier first times  
20 they had used the BMDs, I think.

21 Q. Do you have any knowledge that anyone  
22 breached your privacy while you were voting --

23 A. No.

24 Q. -- on the BMD?

25 A. I don't have any knowledge that anyone

1 not involved in the preparation of the document.  
2 She has no information about how it was prepared.  
3 There's no foundation for this question. All she  
4 has is a piece of paper that she saw for the first  
5 time today in front of her.

6 MS. ELSON: The Curling plaintiffs will  
7 join that objection and have a standing objection to  
8 any others going forward.

9 BY MS. LaROSS:

10 Q. And so let me ask the question,  
11 Ms. Missett: Do you have any reason to believe that  
12 your vote did not count in March of 2020?

13 A. I don't feel I can be sure that it counted.

14 Q. Do you have any evidence that it did not  
15 count?

16 A. No, I don't have evidence that it didn't  
17 count.

18 Q. As to your vote cast on a ballot marking  
19 device in June of 2020, do you have any evidence  
20 that that vote did not count?

21 A. I don't have evidence that that vote didn't  
22 count. I don't have direct evidence, no. I should  
23 point out that you might not have noticed, but I  
24 requested an absentee ballot at that -- during that  
25 election from Fulton County, and it didn't arrive.

1 And that's -- so that's why I think it shows a  
2 request.

3 Q. And that was a request you made to Fulton  
4 County for --

5 A. Yes.

6 Q. -- the absentee ballot?

7 A. Yeah. And I did follow up with them, and  
8 they tried to get it to me, but they didn't end up  
9 sending it in time, so I felt like I was the most  
10 devoted person on the Friday on the last day of  
11 voting.

12 Q. So you voted on the Friday during the last  
13 day of early voting for that election in person?

14 A. Right, because I waited 'til the last  
15 minute to see if I could get my absentee.

16 Q. And are you a member of the Coalition for  
17 Good Governance?

18 A. Yes.

19 Q. Are you a member of any other voter rights  
20 group?

21 A. Affiliated with many voting rights groups.

22 Q. So your affiliation with the other groups,  
23 are you a member of the other groups?

24 A. You have to define "member." I mean, I  
25 do --

1 Q. Many organizations have certain  
2 requirements of becoming a member, and you mentioned  
3 that you are a member of the Georgia Coalition for  
4 Good Governance, so I'm asking that kind of -- are  
5 you a member similarly in other organizations?

6 A. Yes, similarly.

7 Q. Okay. And what are those organizations?

8 A. You know, support organizations like Black  
9 Voters Matter and Common Cause and ACLU of Georgia.  
10 I'm very -- you know, I amplify their work and I  
11 sometimes attend meetings and I send out information  
12 about the things that they're involved in.

13 Q. And you said something about that you  
14 amplify their work. What does that mean?

15 A. On social media.

16 Q. So that would involve posting some of their  
17 work on social media; correct?

18 A. Retweeting, make sure, you know, citizens  
19 get engaged and know what's going on.

20 Q. And you work for the Georgia Coalition for  
21 Good Governance. Did that -- have you held any  
22 official positions with that Coalition for Good  
23 Governance?

24 A. No.

25 Q. And when did you become a member of the

1 plaintiff in this case?

2 A. I was asked by Marilyn Marks, who is the  
3 director of Coalition for Good Governance.

4 Q. And what did she tell you about  
5 participating as a plaintiff in this litigation?

6 A. If I recall, she -- I think the -- it was  
7 a -- it's a lawsuit that was -- that was, you know,  
8 reemerging, had been already in effect.

9 Q. Do you know when it was that you became a  
10 plaintiff in this case?

11 A. It was February -- I can't remember if it  
12 was 2017 or 2018. Do you have that information?

13 Q. Yes. It's my understanding that you became  
14 a party to the lawsuit when the third amended  
15 complaint was filed in 2018. Does that sound  
16 correct?

17 A. February 2018, okay. Yeah. April 2018.

18 Q. And what was it that you were just checking  
19 there to check the date?

20 A. I think it was dates I had jotted down.

21 Q. And what other items have you jotted down  
22 on that list that you just referred to?

23 A. Just -- just dates and, you know, voting,  
24 few dates.

25 Q. And have you referred to that document

1 Q. Do you have any evidence that any of the  
2 votes you cast in Georgia have ever been changed?

3 A. I don't have evidence if they've been  
4 changed.

5 Q. Do you have any evidence that any DRE used  
6 in an election here in Georgia was ever actually  
7 hacked?

8 A. I wouldn't know. I wouldn't be able to  
9 tell.

10 Q. Sorry, there was typing going on. I  
11 couldn't quite hear your answer. Can you repeat  
12 your answer, please?

13 A. Well, my understanding is the servers were  
14 erased. But that is something that maybe could have  
15 been ascertained, but I don't have evidence that my  
16 votes were directly hacked. There is evidence that  
17 there was a probe of the voting system.

18 Q. And then -- and what is that evidence?

19 A. Well, I didn't collect the evidence. I'm  
20 not the FBI, but I think it's commonly known that  
21 information is available.

22 Q. And what election was that related to, the  
23 probe that you just talked about?

24 A. I believe it was 2016; but I'm, you know,  
25 not an expert.



1 Q. Did you have any evidence that any election  
2 during 2016 was hacked?

3 A. Can you be more specific about hacked?

4 Q. Yes. Just that there was some intervention  
5 into the computer system, that there was  
6 irregularities that happened or that some -- some  
7 outside group or individual was able to get into the  
8 voting system.

9 A. There's evidence that there were issues  
10 with poll books, but it's to my knowledge not  
11 evidence as to who did that or why or whether it was  
12 a glitch or intentional.

13 Q. Do you have any evidence that there was  
14 malware inserted in any BMD during any election in  
15 Georgia?

16 A. No. My concerns are over the possibility,  
17 meaning that that could happen; but I don't have any  
18 evidence that that happened to my vote.

19 Q. What about anyone else's vote? Do you have  
20 any evidence that there was malware inserted in  
21 connection with any votes in any election on a BMD  
22 here in Georgia?

23 A. I can't really speak to that. I don't know  
24 what steps were taken to ascertain if that happened.  
25 But I don't have evidence that my vote was tampered

1 with.

2 Q. Do you have any knowledge that any votes  
3 that were cast in Georgia on a BMD, that there was  
4 malware inserted in relation to those votes other  
5 than your own? Do you have any evidence of any  
6 other votes?

7 A. No, not of another vote, only the  
8 possibility.

9 Q. They tell you that there's a possibility of  
10 malware being inserted in voting machines in  
11 Georgia, but do you have any evidence that any  
12 vulnerabilities in the system, in the BMDs has  
13 actually resulted in the insertion of malware?

14 A. No, I don't have any evidence about the  
15 insertion of malware.

16 Q. And when you voted on the BMDs on the two  
17 occasions that you've described, have the concerns  
18 that you've talked about about the machines, have  
19 they come to fruition, that you know of?

20 A. Like what -- no. Can you be more specific?

21 Q. Yeah. I just want to -- because I know you  
22 mentioned that you had concerns about problems with  
23 BMDs.

24 A. Uh-huh.

25 Q. And I'm asking you if you have any evidence

1 that any of those concerns actually happened.

2 A. To my -- I would not be able to come to a  
3 conclusion about that because they aren't -- they're  
4 compromised, they're not auditable, so I can't say.

5 Q. So as you sit here today, you can't say  
6 that there -- any of the problems that you're  
7 concerned about with the BMDs have actually  
8 happened?

9 A. I can't say whether they did or didn't.

10 Q. And do you have any plans to vote on BMDs  
11 in the future?

12 A. I think I've finally given up on that. I  
13 was a holdout, maybe foolishly, because I like to  
14 vote in person. But for all the problems with  
15 mail-in voting and how those votes are counted and  
16 the chain of custody, it's still more recoverable  
17 than voting on a BMD. It's a hand-marked paper  
18 ballot.

19 Q. And then is it your testimony that it is  
20 your plan in future elections here in Georgia to  
21 vote by absentee ballot?

22 A. That's my tentative plan. The problem is  
23 will I get my absentee in time, and also the mail in  
24 Fulton and DeKalb has been really problematic. So  
25 if there aren't drop boxes, I have to take that into

1 consideration.

2 Q. But as long as all of those things happen  
3 correctly, you'll be voting in the future by  
4 absentee ballot; correct?

5 A. While there are BMDs, yeah.

6 Q. I'm going to introduce another exhibit. If  
7 you would just give me a minute.

8 (Deposition Exhibit 3 marked)

9 BY MS. LaROSS:

10 Q. Go ahead and refresh on Exhibit Share,  
11 Ms. Missett.

12 A. The document is 003?

13 Q. Correct, Exhibit 003.

14 A. Okay.

15 Q. Do you see that? Are you seeing that  
16 exhibit, Ms. Missett?

17 A. Yes.

18 Q. Okay. And let me know when you've had a  
19 chance to take a look at it.

20 A. Okay.

21 Q. And what is that document that you've just  
22 reviewed that's been marked as Exhibit 003?

23 A. This is the Declaration of Megan Missett  
24 which was filed 10/23/19.

25 Q. And is this your declaration?

1 mean by "valid." Is that too much to ask? I mean,  
2 if it's just too much to ask for you to define a  
3 core concept in your question, let me know that. I  
4 find that troubling, but tell me that because I'd  
5 like that to be on the record.

6 MS. LaROSS: And I'd like it to be on the  
7 record whether you're instructing her not to answer  
8 the question.

9 MR. ICHTER: I'm asking you what do you  
10 mean by the term "valid."

11 MS. LaROSS: Madam Court Reporter, could  
12 you read back my last question, please?

13 (The reporter read the requested material.)

14 MS. LaROSS: Was there an answer.

15 (The reporter read the requested material.)

16 THE REPORTER: No. "Objection. What do  
17 you mean by valid?"

18 MS. LaROSS: Okay. I'll withdraw the  
19 question.

20 BY MS. LaROSS:

21 Q. Ms. Missett, do you have any evidence that  
22 any component of the Georgia election system was  
23 actually hacked prior to or during the elections  
24 held on November 3rd, 2020?

25 A. I don't have any personal evidence that

1 they were hacked.

2 Q. Do you have any evidence that any malware  
3 was actually inserted into any component of the  
4 Georgia election system prior to or during the  
5 elections held on November 3rd, 2020?

6 A. No.

7 Q. Do you have any evidence that the results  
8 of any election held in Georgia on November 3rd,  
9 2020, were actually changed in any way?

10 A. I don't have any direct evidence.

11 Q. And let me ask that a little bit more  
12 specifically. Do you have any evidence that the  
13 results of any election held in Georgia on November  
14 3rd, 2020, were actually changed in any way as a  
15 result of hacking of or insertion of malware into  
16 any component of the system?

17 A. You're asking me questions I can't answer  
18 because BMDs aren't auditable, so I can't venture to  
19 say that I have faith in the results when I don't  
20 have evidence that they were hacked. I don't know,  
21 and neither do you.

22 Q. Well, that's what my question is is if you  
23 have evidence of actual hacking. And I understand  
24 that question to be no. Is that correct?

25 A. (The witness nods.)

1 Q. You'll have to answer verbally.

2 A. Yes.

3 Q. Okay. Thank you. Do you contend that the  
4 Georgia election system malfunctioned in any way in  
5 connection with the November 3rd, 2020 general  
6 election?

7 A. Can you define that? Do you mean, you  
8 know, machine breakdowns and that sort of thing?

9 Q. Yeah, or anything that would have resulted  
10 in -- that would have resulted in any kind of a  
11 problem with the machine.

12 A. Just things that were commonly reported in  
13 the news or reported by voters on social media or, I  
14 mean, there were many problems, but I don't have an  
15 exhaustive list.

16 Q. So do you contend that the -- any component  
17 of the Georgia election system did not function  
18 properly during the November 3rd, 2020 general  
19 election?

20 A. I have to give the same answer. I think  
21 there was a lot of, you know, evidence and reporting  
22 and documentation that there were things that went  
23 wrong with the machines and the electronic system.

24 Q. Do you have any evidence --

25 A. I can't answer as an expert on --

1 Q. Sorry, I didn't mean to interrupt you. Go  
2 ahead.

3 A. Yeah. I can't answer as an expert or as a  
4 journalist who was reporting and documenting all  
5 those things.

6 Q. And I understand that you're not an expert,  
7 and I'm just asking for your layperson's knowledge.  
8 Do you have any evidence that any vote in the  
9 presidential elections held on November 3rd, 2020,  
10 in Georgia were actually switched from Donald Trump  
11 to Joseph Biden as a result of a problem or anomaly  
12 in the software used in the Georgia election system?

13 A. I don't know of any direct evidence that  
14 that happened.

15 Q. Do you have any direct evidence that any  
16 vote in the presidential election on November 3rd,  
17 2020, was actually switched from Donald Trump to  
18 Joseph Biden as a result of an algorithm or any  
19 other design feature of the Georgia election system?

20 A. I don't have evidence that that happened.

21 Q. Do you have any evidence that any votes in  
22 any other elections held in November of 2020 besides  
23 the presidential election were actually switched  
24 from one candidate to another as a result of a  
25 problem with a component of the Georgia election



1 system?

2 A. You know, I know people have given  
3 depositions to that effect, but I don't know that  
4 happened, so I don't have personal knowledge of that  
5 happening to me or I can't give you dates and times.

6 Q. So I'm not sure I'm clear about your  
7 answer. So do you have any direct evidence that  
8 votes in elections other than the presidential  
9 election in November of 2020 were switched from one  
10 candidate to another?

11 A. I didn't, you know, take depositions. I'm  
12 aware that people have reported that happening, but  
13 I don't have direct evidence.

14 Q. Do you have any direct evidence that the  
15 Georgia election system failed to count any legal  
16 vote in the presidential election held on  
17 November 3rd, 2020, in Georgia?

18 A. No.

19 Q. Do you have any evidence that the Georgia  
20 election system counted any illegal votes in the  
21 presidential election on November 3rd, 2020, in  
22 Georgia?

23 A. I don't have evidence of that occurring.

24 Q. Sorry, I didn't hear your answer.

25 A. I don't have evidence of that occurring.

1 problems have been disclosed or they, you know,  
2 happen to hear about or know about it or whether,  
3 you know, if they're talking to voting machine  
4 vendors or security experts. But beyond the  
5 feelings, I think everybody wondered, you know, if  
6 their ballots can't be audited, if their ballots are  
7 compromised.

8 Q. I'm going to ask you the question -- I'm  
9 sorry, please go ahead.

10 A. They're potentially compromised.

11 Q. Okay. I'm going to ask you the same  
12 questions about the BMDs. So how have you  
13 personally been injured by the use of BMDs in  
14 Georgia?

15 A. Well, I can't -- I continue to vote in  
16 person, although I shouldn't have, knowing what I  
17 know because, you know, I can't trust that my vote  
18 is my vote on the BMDs, which means -- and the only  
19 way in Georgia I can vote on a hand-marked paper  
20 ballot is to vote absentee.

21 Q. And that's typically how you plan to vote  
22 rather than using BMDs in Georgia; correct?

23 A. Yeah. As I said before, there are problems  
24 with the absentees; but it is, you know,  
25 recoverable, at least the ballot itself is not

1 that clear to you?

2 A. Yes, thank you.

3 Q. All right. Ms. Missett, do you have any  
4 direct evidence that the results of the runoff  
5 elections that was held here in Georgia in January  
6 2021, the results were changed in any way as a  
7 result of hacking of or insertion of malware into  
8 any component of the Georgia election system?

9 A. No.

10 Q. Did you have any reason for our -- let me  
11 strike that. I'll start over.

12 Do you know of any reason that the results  
13 from the presidential election in 2020 should be  
14 challenged?

15 A. I don't have direct evidence that the  
16 results were changed. I just, you know -- the  
17 results aren't auditable, so I don't have faith in  
18 the results.

19 Q. Do you have any direct evidence that the  
20 results of the runoff that was held here in Georgia  
21 in January of 2021 should be challenged?

22 A. No direct evidence.

23 Q. And let me ask you also, have you made any  
24 payment to your attorneys in this case for their  
25 services?

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## CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the :-



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LaRita J. Cormier, RPR, CCR No. 2578